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FTI CONSULTING, INC. DISABILITY PLAN,

UNUM LIFE INSURANCE COMPANY OF AMERICA, INC. and

UNUM GROUP, INC.

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Attorneys for Plaintiff

ERIK TERRERI

**UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ERIK TERRERI,

Plaintiff,

v.

FTI CONSULTING, INC. DISABILITY  
PLAN, UNUM LIFE INSURANCE  
COMPANY OF AMERICA, INC., UNUM  
GROUP, INC., AND DOES 1-100, inclusive,

Defendants.

) CASE NO.: CV-10-3867 EMC

)

) **STIPULATION TO CONTINUE CASE**

) **MANAGEMENT CONFERENCE**

) **AND ORDER THEREON, AND**

) **NOTICE OF CHAPTER 7**

) **BANKRUPTCY ; ORDER**

)

) **Current Date: August 30, 2011**

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1 IT IS HEREBY STIPULATED by and between the plaintiff ERIK TERRERI and  
 2 defendants FTI CONSULTING, INC. DISABILITY PLAN, UNUM LIFE INSURANCE  
 3 COMPANY OF AMERICA, INC. and UNUM GROUP, INC. (collectively "Unum"), by and  
 4 through their counsel of record herein, to a continuance of the Case Management Conference,  
 5 currently scheduled for August 30, 2011 at 3:00 p.m. for approximately 90 days.

6 Good cause exists for this extension because plaintiff has filed a Chapter 7 Bankruptcy  
 7 case. The Notice of Bankruptcy is attached. The parties have not yet been released from  
 8 bankruptcy which will likely occur within the next 90 days. As a result, the parties respectfully  
 9 request that the Case Management Conference be continued for 90 days to a date convenient for  
 10 the Court.

11 Pursuant to local rules, this document is being electronically filed through the Court's  
 12 ECF System. In this regard, counsel for defendant hereby attests that (1) the content of this  
 13 document is acceptable to all persons required to sign the document; (2) plaintiff's counsel has  
 14 concurred with the filing of this document; and (3) a record supporting this concurrence is  
 15 available for inspection or production if so ordered.

16  
 17 **SO STIPULATED.**

18  
 19 **GOLDSTEIN, GELLMAN,  
 MELBOSTAD & HARRIS, LLP**

20  
 21 DATED: August 22, 2011

22 By: /s/ Lee S. Harris  
 23 LEE S. HARRIS  
 24 Attorneys for Plaintiff  
 25 ERIK TERRERI

**RIMAC MARTIN, P.C.**

DATED: August 22, 2011

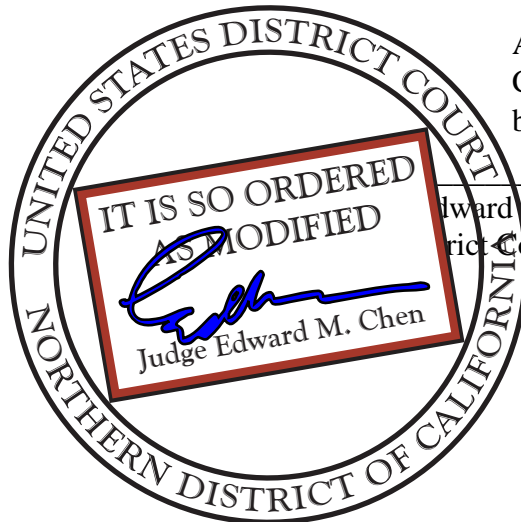
By: /s/ Anna M. Martin

ANNA M. MARTIN  
Attorneys for Defendants  
FTI CONSULTING, INC. DISABILITY  
PLAN, UNUM LIFE INSURANCE  
COMPANY OF AMERICA, INC. and  
UNUM GROUP, INC.

**IT IS SO ORDERED:**

The Case Management Conference is hereby continued to 12/9/11 at 10:30 a.m.

An update joint  
CMC statement shall  
be filed by 12/2/11.



Edward M. Chen  
District Court Judge

PROOF OF SERVICE

Terreri v. FTI Consulting, Inc. Disability Plan, et al.  
USDC, Northern District of California, Case No. Cv-10-3867 EMC

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 1051 Divisadero Street, San Francisco, California, 94115.

On August 22, 2011, I served the foregoing document described as follows:

**STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE AND ORDER THEREON, AND NOTICE OF CHAPTER 7 BANKRUPTCY** on all interested parties, through their respective attorneys of record in this action, by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

LEE S. HARRIS  
**GOLDSTEIN, GELLMAN, MELBOSTAD & HARRIS, LLP**  
[LHarris@g3mh.com](mailto:LHarris@g3mh.com)  
1388 Sutter Street, Suite 1000  
San Francisco, CA 94109-5494  
Telephone: (415) 673-6600  
Facsimile: (415) 673-5606

Attorneys for Plaintiff  
ERIK TERRERI

☐ (BY MAIL) True and correct copies of the aforementioned document(s) were deposited, in a sealed envelope with postage thereon fully prepaid, with the U.S. Postal Service on that same day to be mailed via first class mail at San Francisco, California. I am aware that on

1 motion of the party served, service is presumed invalid if postal cancellation date or postage  
2 meter date is more than one day after date of deposit for mailing in affidavit.

3 X (TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF))

4 Pursuant to the controlling Rules, the aforementioned document(s) will be served by the court  
5 via NEF and proper link(s) to the document(s). On 8/22/11, I checked the appropriate CM/ECF  
6 docket for this case or proceeding and determined that the aforementioned person(s) has/have  
7 consented to receive NEF transmission at the aforementioned electronic addresses.

8 ☐ (BY ELECTRONIC SERVICE) On , I transmitted the aforementioned document(s) as  
9 PDF attachments to the aforementioned electronic notification address(es). The transmission  
10 originated from my electronic notification address, which is , and was reported as complete  
11 and without error.

12  
13 I declare under penalty of perjury under the laws of the State of California that the above  
14 is true and correct.

15 Executed on **August 22, 2011** at San Francisco, California.

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